Honorable Karen L. Stromborn

1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON, AT TACOMA 9 EMPLOYEE PAINTERS TRUST HEALTH AND WELFARE FUND, WESTERN CAUSE NO.: CV04-5097 KLS 10 WASHINGTON PAINTERS DEFINED CONTRIBUTIONS PENSION TRUST. JOINT MOTION TO GRANT 11 WESTERN WASHINGTON APPRENTICESHIP ADDITIONAL TIME AND ORDER AND TRAINING TRUST, WESTERN GRANTING ADDITIONAL TIME 12 WASHINGTON PAINTERS LABOR-MANAGEMENT COOPERATION TRUST 13 FUND, and THE INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES 14 INDUSTRY PENSION FUND, 15 Plaintiffs, 16 VS. 17 RELIANCE PAINT COMPANY, LLC, a Washington limited liability company, BRAIN R. 18 BESAW and CARMEN BESAW, husband and wife and their martial community comprised 19 thereof. 20 Defendants. 21 The Employee Painters Trust Health and Welfare Fund, Western Washington Painters 22 Defined Contributions Pension Trust, Western Washington Apprenticeship and Training Trust, 23 Western Washington Painters Labor-Management Cooperation Trust Fund, and the 24 International Union of Painters and Allied Trades Industry Pension Fund (the Trust Funds) and 25 EKMAN, BOHRER & THULIN, P.S. JOINT MOTION TO GRANT ADDITIONAL TIME AND ORDER QUEEN ANNE SQUARE 220 WEST MERCER ST., SUITE 400 CASE NO. CV04-5097 KLS - PAGE 1 OF 3

220 WEST MERCER ST., SUITE 400 SEATTLE, WASHINGTON 98119 TELEPHONE (206) 282-8221 FAX (206) 285-4587

1	Brian and Carmen Besaw do hereby make this Joint Motion and respectfully request that the
2	Court enter the attached Order granting the Trust Funds additional time to file a Response to
3	Motion and Affidavit to Vacate Judgment Lien and Lis Pendens.
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5	Jointly Submitted by Counsel
6	S/David L. Tuttle WSBA #38728
7	Ekman, Bohrer & Thulin, P.S. 220 W. Mercer, Ste. 400
8	Seattle, WA 98119 Telephone: (206) 282-8221
9	Fax: (206) 285-4587 E-mail: d.tuttle@ekmanbohrer.com
10	Attorney for the Trust Funds
11	s/Terry A. Robinson WSBA #13991
12	16719 110 th Ave. E, Suite C Puyallup, WA 98374
	Telephone (253) 770-2769
13	Fax: (253) 770-2790 Attorney for Mr. and Ms. Besaw
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15	Pursuant the parties Joint Motion to Grant Additional Time, and the Court having
16	considered the pleadings on file and being otherwise generally advised, it is hereby
17	ORDERED that the Employee Painters Trust Health and Welfare Fund, Western
18	Washington Painters Defined Contributions Pension Trust, Western Washington
19	Apprenticeship and Training Trust, Western Washington Painters Labor-Management
20	Cooperation Trust Fund, and the International Union of Painters and Allied Trades Industry
21	Pension Fund shall have until Friday, August 28, 2009 to file their response to Mr. and Ms.
22	Besaw's Motion to Vacate Judgment Lien and Lis Pendens.
23	besaw 5 Motion to vacate judgment Lien and Lis Fendens.
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1	DATED this 1 st day of September, 2009.
2	
3	s/Karen L. Strombom U.S. Magistrate Judge
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5	Presented by:
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7	S/David L. Tuttle WSBA #38728
8	Ekman, Bohrer & Thulin, P.S. 220 W. Mercer, Ste. 400
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